IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Appellant:	David H. Hanes	Examiner: Joseph E. Avellino
Serial No.:	10/824,242	Group Art Unit: 2446
Filed:	April 14, 2004	Docket No.: 200309081-1
Title:	REDIRECTING I/O REQUEST TO REMOTE NETWORKED PERIPHERAL DEVICE (As Amended)	

SUPPLEMENTAL APPEAL BRIEF UNDER 37 C.F.R. §41.37

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This Supplemental Appeal Brief is in response to the Notification of Non-Compliant Appeal Brief mailed February 5, 2010. This Supplemental Appeal Brief is in support of the Appeal Brief filed on November 30, 2009 and the Notice of Appeal filed on September 29, 2009, appealing the final rejection of claims 1, 2, 4-14, 16-25, 27-36, 38, 40-43, and 45-48 of the above-identified application as set forth in the Final Office Action mailed June 29, 2009.

The Notification of Non-Compliant Appeal Brief mailed February 5, 2010 indicated that the Summary of the Claimed Subject Matter Section in the Appeal Brief filed on November 30, 2009 fails to map claim limitations to specific citations in the specification. The following is a revised "Summary of the Claimed Subject Matter" Section that contains mapping of claim limitations to specific citations to the specification.

SUMMARY OF THE CLAIMED SUBJECT MATTER

The Summary is set forth as exemplary embodiments corresponding to the language of independent claims 1, 13, 24, 33, 38, and 43. Discussions about elements of claims 1, 13, 24, 33, 38, and 43 can be found at least at the cited locations in the specification and drawings.

One embodiment of the present invention, as claimed in independent claim 1, is a processing system (100) (see e.g., Figure 1 and paragraph [0017], lines 4-5; and Figure 2 and paragraph [0020], lines 1-2). The system comprises a processor (115) (see e.g., Figure 2 and paragraph [0020], lines 4 and 6 and paragraph [0021], line 1) and memory (110) (see e.g., Figure 2 and paragraph [0020], line 2-3) storing instructions executable by the processor. The instructions comprise a drive command module (20) (see e.g., Figure 1 and paragraph [0017], line 6 and paragraph [0018], line 3) adapted to receive an I/O request (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3) from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) referencing a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) of a peripheral device (80/81/empty host adapter slot) (see e.g., Figure 1 and paragraph [0018], line 9) for processing of the I/O request; and a network redirector (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3) communicatively coupled to the drive command module. The redirector is invoked by the drive command module. The redirector is adapted to automatically and transparent to the client application convey the I/O request over a communication network (130) (see e.g., Figure 1 and paragraph [0019, lines 7-8) to a remote peripheral device (85) (see e.g., Figure 1 and paragraph [0019], line 9) for processing of the I/O request. The redirector is adapted to replace the local peripheral address of the I/O request with an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote peripheral device. *See generally e.g., Present Specification at paragraphs [0016] – [0022] and Figures 1 and 2.*

One embodiment of the present invention, as claimed in independent claim 13 is a method for input/output (I/O) request processing. The method comprises receiving an I/O request (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3)

from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) referencing a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) of a peripheral device (80/81/empty host adapter slot) (see e.g., Figure 1 and paragraph [0018], line 9) for processing of the I/O request; automatically and transparent to the client application invoking a network redirector (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3) adapted to convey the I/O request to a communication network (130) (see e.g., Figure 1 and paragraph [0019, lines 7-8) to enable processing of the I/O request by a remote peripheral device (85) (see e.g., Figure 1 and paragraph [0019], line 9); and replacing the local peripheral address of the I/O request with an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote peripheral device. *See generally e.g., Present Specification at paragraphs [0016] – [0022] and Figures 1 and 2.*

One embodiment of the present invention, as claimed in independent claim 24 is a processing system (100) (see e.g., Figure 1 and paragraph [0017], lines 4-5; and Figure 2 and paragraph [0020], lines 1-2). The system comprises a processor (115) (see e.g., Figure 2 and paragraph [0020], lines 4 and 6 and paragraph [0021], line 1) and memory (110) (see e.g., Figure 2 and paragraph [0020], line 2-3) storing instructions executable by the processor. The instructions comprise a drive command module (20) (see e.g., Figure 1 and paragraph [0017], line 6 and paragraph [0018], line 3) adapted to receive a command (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3) from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) to record data to an optical medium; and a network redirector (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3) communicatively coupled to the drive command module. The redirector is invoked by the drive command module. The redirector is adapted to receive the drive command from the drive command module and automatically and transparent to the client application format the command for processing by a remote optical drive (200) (see e.g., Figure 1 and paragraph [0025], lines2-4). The redirector is adapted to automatically replace a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) associated with the drive command with an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote optical drive. *See*

generally e.g., Present Specification at paragraphs [0016] – [0022] and [0025] and Figures 1 and 2.

One embodiment of the present invention, as claimed in independent claim 33 is a processing system (100) (see e.g., Figure 1 and paragraph [0017], lines 4-5; and Figure 2 and paragraph [0020], lines 1-2). The system comprises a processor (115) (see e.g., Figure 2 and paragraph [0020], lines 4 and 6 and paragraph [0021], line 1) and memory (110) (see e.g., Figure 2 and paragraph [0020], line 2-3) storing instructions executable by the processor. The instructions comprise means (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3) for receiving an I/O request (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3) from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) referencing a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) of a peripheral device (80/81/empty host adapter slot) (see e.g., Figure 1 and paragraph [0018], line 9) for processing of the I/O request; means (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3), communicatively coupled to the receiving means, for automatically conveying the I/O request over a communication network (130) (see e.g., Figure 1 and paragraph [0019, lines 7-8) to a remote peripheral device (85) (see e.g., Figure 1 and paragraph [0019], line 9); and means (120) (see e.g., Figure 1 and paragraph [0019], lines 1-3) for inserting an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote peripheral device into a drive command issued by the receiving means. *See generally e.g., Present Specification at paragraphs [0016] – [0022] and Figures 1 and 2.*

One embodiment of the present invention, as claimed in independent claim 38 is an input/output (I/O) request processing method. The method comprises receiving a drive command (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3) from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) at a host device (100) (see e.g., Figure 1 and paragraph [0017], lines 4-5; and Figure 2 and paragraph [0020], lines 1-2) to record data to an optical medium; automatically and transparent to the client application formatting the drive command for processing by a remote optical drive (200) (see e.g., Figure 1 and paragraph

[0025], lines2-4); and automatically replacing a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) associated with the drive command with an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote optical drive. *See generally e.g. ,Present Specification at paragraphs [0016] – [0022] and [0025] and Figures 1 and 2.*

One embodiment of the present invention, as claimed in independent claim 43 is a computer readable medium (110) (see e.g., Figure 2 and paragraph [0020], line 3 and paragraph [0032]) having stored thereon an instruction set to be executed. The instruction set, when executed by a processor (115) (see e.g., Figure 2 and paragraph [0020], lines 4 and 6 and paragraph [0021], line 1), causes the processor to receive an input/output (I/O) request (15) (see e.g., Figure 1 and paragraph [0017], line 7 and paragraph [0018], lines 2-3) from a client application (10) (see e.g., Figure 1 and paragraph [0017], lines 3-5, and 8; and Figure 2 and paragraph [0020], line 2) referencing a local peripheral address (A/B/C) (see e.g., Figure 1 and paragraph [0018], lines 9-13) of a peripheral device (80/81/empty host adapter slot) (see e.g., Figure 1 and paragraph [0018], line 9) for processing of the I/O request; and automatically and transparent to the client application convey the I/O request over a communication network (130) (see e.g., Figure 1 and paragraph [0019, lines 7-8) to a remote peripheral device (85) (see e.g., Figure 1 and paragraph [0019], line 9) for processing of the I/O request. The instruction set, when executed by a processor, causes the processor to replace the local peripheral address with an address (D) (see e.g., Figure 1 and paragraph [0019], line 9) associated with the remote peripheral device. *See generally e.g., Present Specification at paragraphs [0016] – [0022] and [0032] and Figures 1 and 2.*

In view of the Appeal Brief filed November 30, 2009 and this Supplemental Appeal Brief, Appellants respectfully request consideration and reversal of the Examiner's rejections of pending claims 1, 2, 4-14, 16-25, 27-36, 38, 40-43, and 45-48.

Any inquiry regarding this Response should be directed to Patrick G. Billig at Telephone No. (612) 573-2003, Facsimile No. (612) 573-2005.

Respectfully submitted,

David H. Hanes,

By his attorneys,

DICKE, BILLIG & CZAJA, PLLC
Fifth Street Towers, Suite 2250
100 South Fifth Street
Minneapolis, MN 55402
Telephone: (612) 573-2003
Facsimile: (612) 573-2005

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PGB:mlm

/Patrick G. Billig/
Patrick G. Billig
Reg. No. 38,080